

October 28, 2009

ULNRC-05666

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
REQUEST TO CORRECT TYPOGRAPHICAL ERROR IDENTIFIED IN
TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT 3.7.18.1**



The purpose of this letter is to request action for correction a typographical error identified in Technical Specification (TS) 3.7.18, "Secondary Specific Activity," of the Callaway Technical Specifications. The error is that the "μ" symbol is missing from the units given for the value of the specific activity limit specified in Surveillance Requirement (SR) 3.7.18.1. As explained below, the error initially occurred in connection with the issuance of Amendment 172 to the Callaway Operating License but was identified after receipt of recently issued License Amendment 190.

From review of previous license amendments that affected TS 3.7.18, it appears that the "μ" symbol was present in SR 3.7.18.1 at the time when License Amendment 133 was issued. Subsequent to that amendment, Callaway did not request any changes that directly affected SR 3.7.18.1; however, several amendments were issued that caused the TS 3.7.18 pages to be re-numbered due to re-pagination required for other TS changes. In particular, it was determined that the "μ" symbol was inadvertently omitted with the issuance of Amendment 172 in June 2006. This amendment significantly increased the scope of TS 3.7.2 (Main Steam Isolation Valves) such that a significant amount of text was inserted into the TS. Due to the inserted text, the amendment required issuing revised pages for all of TS Section 3.7 due to re-pagination.

At the time when Amendment 172 was incorporated, there were two issues being addressed with respect to the TS master files that are maintained at Callaway. The first issue involved pagination problems being experienced with Microsoft Word, particularly the random loss of data occurring with the deletion of page breaks. The second issue involved anomalies with the conversion of TS files from Microsoft Word to Adobe Framemaker. One of these issues likely caused the omission introduced in connection with Amendment 172. However, both issues were

subsequently resolved with completion of the conversion to Adobe Framemaker in 2006.

The last amendment that affected TS 3.7.18 pages due to re-pagination was License Amendment 190 which was issued to Callaway earlier this year and was recently implemented in September. Since License Amendment 190 is the last amendment that affected the pages associated with TS 3.7.18, and in order to correct the problem of the missing “μ” in SR 3.7.18.1, AmerenUE is hereby requesting the NRC to re-issue a corrected TS page 3.7-43 for License Amendment 190, reflecting the corrected specific activity units for SR 3.7.18.1. The enclosure to this letter provides a corrected, clean-typed copy of page 3.7-43 (with Amendment No. 190 indicated on the page) for your use in re-issuance of the corrected page.

It should be noted that although the “μ” is missing from the specific activity units given in SR 3.7.18.1, the “μ” does properly appear in the specific activity units given in the Limiting Condition for Operation (LCO) section of TS 3.7.18. Further, the plant surveillance procedure(s) for implementing SR 3.7.18.1 reflects the correct units for the specific activity limit as specified in the acceptance criteria of the procedure(s). Therefore, there is no TS compliance issue associated with the currently missing “μ” in SR 3.7.18.1.

This letter contains no new commitments. Please contact Tom Elwood, Supervising Engineer, Regulatory Affairs and Licensing at 573-676-6479 for any questions you may have regarding this submittal.

Sincerely,



Scott Sandbothe
Manager – Plant Support

Enclosure

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Enclosure 1

CORRECTED TECHNICAL SPECIFICATION 3.7.18 PAGE

3.7 PLANT SYSTEMS

3.7.18 Secondary Specific Activity

LCO 3.7.18 The specific activity of the secondary coolant shall be $\leq 0.10 \mu\text{Ci/gm}$
DOSE EQUIVALENT I-131.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Specific activity not within limit.	A.1 Be in MODE 3.	6 hours
	<u>AND</u>	
	A.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.18.1 Verify the specific activity of the secondary coolant is $\leq 0.10 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.	31 days